

Response to Comments

On Draft National Pollutant Discharge Elimination System (NPDES) Permit for

**The Quinault Indian Nation
Taholah Wastewater Treatment Plant
Permit No. WA-002343-4**

Background

On July 14, 2005, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) permit for The Quinault Indian Nation, Taholah Wastewater Treatment Plant. The Public Notice of the draft permit initiated a 30-day public comment period which expired August 15, 2005. The EPA received comments on the draft permit from Mr. Samuel Iwenofu the Water Resource Manager for the Quinault Indian Nation. No other comments were received.

Comments and Responses

Comment 1

The Quinault Indian Nation, Mr. Samuel Iwenofu was concerned on the lack of an *Escherichia coli* (E. coli) limit.

Response 1

Since the Quinault Indian Nation does not have approved Water Quality Standards, the effluent limits of this NPDES permit are based on applicable federal water quality standards. The facility discharges into rapid infiltration basins that are hydrological connected to the Quinault River, which empties into the Pacific Ocean. The Beaches Environmental Assessment and Coastal Health (BEACH) Act of 2000 only address bacterial limits in marine waters. The 1986 Ambient Water Quality Criteria for Bacteria recommended criteria for *Escherichia coli* (E. coli) in freshwater for Infrequently Used Full Body Contact Recreation (upper 95% Confidence Interval) is 126 organisms/100 mL effluent for average monthly limit and 576 organisms/100 mL effluent for maximum daily limit. Based on the comment from the Quinault Indian Nation, this recommended criterion is included directly in the permit as a limitation.

Final Permit Modification: Make changes in **Table 1: Effluent Limitations and Monitoring Requirements** located in Section I. Limitations and Monitoring Requirements.

Comment 2

System overflows were not addressed in the draft permit. This was an oversight.

Response

EPA agrees that system overflows should be reported within 24 hours and have modified the permit.

Final Permit Modification:

Located in Section II. Monitoring, Recording and Reporting Requirements. The italicized text indicates new language in the NPDES permit.

G. Twenty-four Hour Notice of Noncompliance Reporting

1. The permittee must report the following occurrences of noncompliance by telephone within 24 hours from the time the permittee becomes aware of the circumstances:
 - a) any noncompliance that may endanger health or the environment;
 - b) any unanticipated bypass that exceeds any effluent limitation in the permit (See Part IV.F., “Bypass of Treatment Facilities”);
 - c) any upset that exceeds any effluent limitation in the permit (See Part IV.G., “Upset Conditions”); or
 - d) any violation of a maximum daily discharge limitation for any of the pollutants in [Table 1 of Part I.B.](#)
 - e) *any overflow prior to the treatment works, whether or not such overflow endangers health or the environment or exceeds any effluent limitation in the permit.*
2. The permittee must also provide a written submission within five days of the time that the permittee becomes aware of any event required to be reported under subpart 1 above. The written submission must contain:
 - a) a description of the noncompliance and its cause;
 - b) the period of noncompliance, including exact dates and times;
 - c) the estimated time noncompliance is expected to continue if it has not been corrected; and
 - d) steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
 - e) *if the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow.*

Response prepared by Rebecca Derr, EPA Region 10, September 2005.